

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

COREY BOUCHEA GRANT (1)
JOHN DAVID HARTUNG (2)
MATTHEW CURTIS ANDERSON (3)
THOMAS ALLEN MARTIN (4)
SYDNEY MICHELLE SISK (5)
TYLER JOSEPH GATTEN (6)
a.k.a. "Chains"
MEREDITH STOTSKY (7)
TYLER ALLEN STOTSKY (8)
[REDACTED] (9)
PRENTISS LAVALE MULLINS (10)
a.k.a. "P-Money"
[REDACTED] (11)
a.k.a. [REDACTED]
ZACHERY XAVIER WILLIAMS (12)
a.k.a. "Netta"
[REDACTED] (13)
a.k.a. [REDACTED]
EBONY NICOLE FRANK (14)
[REDACTED] (15)
a.k.a. [REDACTED]
[REDACTED] (16)
a.k.a. [REDACTED]
[REDACTED] (17)
a.k.a. [REDACTED]
YESHMEL JAMES WRIGHT (18)
[REDACTED] (19)
MARK ANTHONY JACKSON (20)
a.k.a. "Chopper"
JASMINE ARNETTA PLEASANT (21)
[REDACTED] (22)
a.k.a. [REDACTED]
COLLIN PIERSON NICODEMUS (23)
[REDACTED] (24)
a.k.a. [REDACTED]

SEALED

No. 4:21-CR-300
Judge Jordan

[REDACTED] (25)	§
CHANCELLOR MARTIN RAMSEY (26)	§
a.k.a. "Chance"	§
SAVANNAH ASHLYN TURCIC (27)	§
DANIEL TOMAS REYNA (28)	§
[REDACTED] (29)	§
JOSHUA KYLE MCCLURG (30)	§
NATHAN EDWARD MILBERY (31)	§
[REDACTED] (32)	§
[REDACTED] (33)	§
[REDACTED] (34)	§
a.k.a. [REDACTED]	§
[REDACTED] (35)	§
a.k.a. [REDACTED]	§
ADAN MENDOZA (36)	§
[REDACTED] (37)	§
[REDACTED] (38)	§
a.k.a. [REDACTED]	§
[REDACTED] (39)	§
[REDACTED] (40)	§
a.k.a. [REDACTED]	§
[REDACTED] (41)	§
[REDACTED] (42)	§

THIRD SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846
(Conspiracy to Possess with Intent
to Manufacture, Distribute and
Dispense Heroin and
Methamphetamine) and 18 U.S.C.
§ 2 (Aiding and Abetting)

That from sometime in or about January 2019, and continuously thereafter up to
and including the date of the Third Superseding Indictment, in the Eastern District of
Texas and elsewhere,

Corey Bouchea Grant
John David Hartung
Matthew Curtis Anderson
Thomas Allen Martin
Sydney Michelle Sisk
Tyler Joseph Gatten, a.k.a. "Chains"
Meredith Stotsky
Tyler Allen Stotsky

[REDACTED]
Prentiss Lavale Mullins, a.k.a "P-Money"

[REDACTED] a.k.a. [REDACTED]
Zachery Xavier Williams, a.k.a. "Netta"

[REDACTED] a.k.a. [REDACTED]
Ebony Nicole Frank

[REDACTED] a.k.a. [REDACTED]
[REDACTED] a.k.a. " [REDACTED]"
[REDACTED] a.k.a. [REDACTED]
Yeshmel James Wright

[REDACTED]
Mark Anthony Jackson, a.k.a. "Chopper"

Jasmine Arnetta Pleasant

[REDACTED] a.k.a. [REDACTED]

Collin Pierson Nicodemus

[REDACTED] a.k.a. [REDACTED]

[REDACTED]
Chancellor Martin Ramsey, a.k.a. "Chance"

Savannah Ashlyn Turcic

Daniel Tomas Reyna

[REDACTED]

Joshua Kyle McClurg

Nathan Edward Milbery

[REDACTED]
[REDACTED] a.k.a. [REDACTED]
[REDACTED] a.k.a. [REDACTED]

Adan Mendoza

[REDACTED]
[REDACTED] a.k.a. [REDACTED]

[REDACTED]
[REDACTED] a.k.a. [REDACTED]

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture, distribute and dispense one (1) kilogram or more of a mixture containing a detectable amount of heroin; 50 grams or more of methamphetamine (actual) or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a violation of 21 U.S.C. § 841(a)(1).

Death Resulting from the Conspiracy to Distribute and Dispense Heroin

On or about October 29, 2021, heroin was distributed and dispensed to MG resulting in death.

All in violation of 21 U.S.C. §§ 841, 842, 846 and 18 U.S.C. § 2.

Count Two

Violation: 18 U.S.C. § 924(c)
(Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime)

On or about November 8, 2021, within the Northern District of Texas, **Corey Bouchea Grant**, defendant, during and in relation to a drug trafficking crime did knowingly possess a firearm, namely a KEL-TEC P3AT .380ACP pistol, Serial Number J0U53, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture, distribute and dispense heroin and methamphetamine.

In violation of 18 U.S.C. § 924(c).

Count Three

Violation: 18 U.S.C. § 924(c)
(Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime)

On or about November 5, 2021, within the Eastern District of Texas, **Matthew Curtis Anderson**, defendant, during and in relation to a drug trafficking crime did knowingly possess a firearm, namely a Taurus G2 9mm pistol, Serial Number TIY64803, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture, distribute and dispense heroin and methamphetamine.

In violation of 18 U.S.C. § 924(c).

Count Four

Violation: 18 U.S.C. § 924(c)
(Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime)

On or about November 24, 2021, within the Eastern District of Texas, **Thomas Allen Martin**, defendant, during and in relation to a drug trafficking crime did knowingly possess a firearm, namely a Jimenez Arms 9mm pistol with the serial number filed off, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture, distribute and dispense heroin and methamphetamine.

In violation of 18 U.S.C. § 924(c).

Count Five

Violation: 18 U.S.C. § 924(c)
(Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime)

On or about March 11, 2021, within the Eastern District of Texas, **Tyler Joseph Gatten**, defendant, during and in relation to a drug trafficking crime did knowingly possess a firearm, namely a Taurus 9mm pistol, Serial Number ABK045114, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture, distribute and dispense heroin and methamphetamine.

In violation of 18 U.S.C. § 924(c).

Count Six

Violation: 18 U.S.C. § 924(c)
(Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime)

On or about March 11, 2021, within the Eastern District of Texas, **Tyler Joseph Gatten**, defendant, during and in relation to a drug trafficking crime did knowingly possess a firearm, namely an American Tactical .45ACP pistol, Serial Number TB101222, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture, distribute and dispense heroin and methamphetamine.

In violation of 18 U.S.C. § 924(c).

Count Seven

Violation: 18 U.S.C. § 924(c)
(Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime)

On or about January 14, 2021, within the Eastern District of Texas, **Jasmine Arnetta Pleasant**, defendant, during and in relation to a drug trafficking crime did knowingly possess a firearm, namely a Ruger LCP II .22LR pistol, Serial Number 380560514, in furtherance of a drug trafficking crime for which she may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture, distribute and dispense a controlled substance.

In violation of 18 U.S.C. § 924(c).

Count Eight

Violation: 18 U.S.C. § 924(c)
(Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime)

On or about December 23, 2020, within the Western District of Tennessee, **Tyler Allen Stotsky**, defendant, during and in relation to a drug trafficking crime did knowingly possess firearms, namely a Fabrique National model 509 pistol, Serial Number GKS0005965, Springfield Armory model Hellcat pistol, Serial Number AT263307, Ruger model M77 rifle, Serial Number 712-50674, Sig Sauer model 716 G2 rifle, Serial Number 22P072270, Ruger model Ruger Precision Rifle, Serial Number 1801-11862, all in furtherance of a drug trafficking crime for which he may be

prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture, distribute and dispense a controlled substance.

All in violation of 18 U.S.C. § 924(c).

Count Nine

Violation: 21 U.S.C. § 846
(Conspiracy to Possess with the
Intent to Manufacture, Distribute
and Dispense Controlled
Substances) and 18 U.S.C. § 2
(Aiding and Abetting)

That from sometime in or about May 2020, and continuously thereafter up to and including the date of the Third Superseding Indictment, in the Eastern District of Texas and elsewhere,

Tyler Joseph Gatten, a.k.a. “Chains”

Meredith Stotsky

Tyler Allen Stotsky

a.k.a.

a.k.a. “

a.k.a.

Yeshmel James Wright

Mark Anthony Jackson, a.k.a. “Chopper”

Jasmine Arnetta Pleasant

a.k.a.

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture, distribute, and dispense mixtures or substances containing detectable amounts of a Schedule 1 controlled substance, to wit: ADB-BUTINACA, MDMB-4en-PINACA, and 4F-MDMB-BUTICA, a violation of 21

U.S.C. §§ 841(a)(1) and (b)(1)(c); knowing that the substance was intended for human consumption as provided in 21 U.S.C. § 813.

All in violation of 21 U.S.C. §§ 841 and 846 and 18 U.S.C. § 2.

Count Ten

Violation: 18 U.S.C. §§ 1956(h)
(Conspiracy to Commit Money
Laundering) and 2 (Aiding and
Abetting)

That from sometime in or about January 2019, and continuously thereafter up to
and including the date of the Third Superseding Indictment,

Corey Bouchea Grant
John David Hartung
Matthew Curtis Anderson
Tyler Joseph Gatten, a.k.a. "Chains"
Meredith Stotsky
Tyler Allen Stotsky

[REDACTED]
[REDACTED] a.k.a. [REDACTED]
Zachery Xavier Williams, a.k.a. "Netta"

[REDACTED] a.k.a. [REDACTED]
[REDACTED] a.k.a. [REDACTED]
[REDACTED] a.k.a. [REDACTED]
[REDACTED] a.k.a. [REDACTED]

Collin Pierson Nicodemus
Chancellor Martin Ramsey, a.k.a. "Chance"
Savannah Ashlyn Turcic
Daniel Tomas Reyna

[REDACTED]
Joshua Kyle McClurg
Nathan Edward Milbery

[REDACTED] a.k.a. [REDACTED]
[REDACTED]
[REDACTED]

defendants, did knowingly combine, conspire, and agree together and with each other and with other persons known and unknown to the grand jury to conduct or attempt to conduct financial transactions:

1. knowing that the property involved in a financial transaction(s) represented the proceeds of some form of unlawful activity, conducted or attempted to conduct a financial transaction which in fact involved the proceeds of a specified unlawful activity, conspiracy or distribution or possession with the intent to distribute a controlled substance(s) with the intent to promote the carrying on a specified unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(A)(i);

2. knowing that the property involved in a financial transaction or transactions represented the proceeds of some form of unlawful activity, conducted or attempted to conduct a financial transaction which in fact involved the proceeds of a specified unlawful activity, conspiracy or distribution or possession with the intent to distribute a controlled substance(s) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of that specified unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(B)(i);

3. promoting the carrying on of a specified unlawful activity; or, to conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity, conduct or attempt to conduct a financial transaction involving property represented to be the proceeds of specified unlawful activity; that is, conspiracy or distribution or possession with the intent to distribute a

controlled substance(s), or property used to conduct or facilitate specified unlawful activity in violation of 18 U.S.C. § 1956(a)(3);

4. involving criminally derived property of a value greater than \$10,000 that is derived from a specified unlawful activity; that is, conspiracy or distribution or possession with the intent to distribute a controlled substance(s) in violation of 18 U.S.C. § 1957.

All in violation of 18 U.S.C. §§ 1956(h) and 2.

Count Eleven

Violation: 49 U.S.C. §§ 46306(b)(6) and (c)(2) (Operating an Aircraft Eligible for Registration Knowing that the Aircraft is not Registered to Facilitate a Controlled Substance Offense) and 18 U.S.C. § 2 (Aiding and Abetting)

That from sometime in or about May 2020 and continuously thereafter up to and including January 17, 2021, [REDACTED] defendant, did knowingly and willfully operate and attempt to operate an aircraft eligible for registration by the Federal Aviation Administration under Title 49 of the United States Code, knowing that the aircraft was not registered and said operation related to the facilitating of a controlled substance offense punishable by more than one year imprisonment, to wit: Possession with Intent to Distribute a controlled substance as described in Count Nine of this indictment in violation of 49 U.S.C. §§ 46306(b)(6) and (c)(2) and 18 U.S.C. § 2.

Count Twelve

Violation: 18 U.S.C. § 924(c)
(Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime)

On or about July 30, 2021, within the Eastern District of Texas, [REDACTED]
[REDACTED] defendant, during and in relation to a drug trafficking crime did knowingly
possess a firearm, namely a Taurus G2C 9mm pistol, Serial Number TLY23792, in
furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the
United States, to wit: conspiracy to possess with the intent to manufacture, distribute and
dispense heroin and methamphetamine.

In violation of 18 U.S.C. § 924(c).

Count Thirteen

Violation: 18 U.S.C. §§ 1951(a)
(Interference with Commerce by
Robbery) and 2 (Aiding and
Abetting)

That on or about the last week of July 2021, in the Eastern District of Texas,

Matthew Curtis Anderson
[REDACTED]

defendants, aided and abetted by each other, did knowingly, willfully, and unlawfully
obstruct, delay, and effect commerce, and attempt to obstruct delay, and affect
commerce, as the term is defined in under 18 U.S.C. §§ 1951(a), in that the defendants,
aiding and abetting each other, did knowingly attempt to take and obtain, narcotics from
the person and property of “BB,” against BB’s will, by means of actual and threatened

force, violence, and fear of injury, immediate and future, to BB's person and the persons staying with BB, and did aid and abet in the same.

In violation of 18 U.S.C. § 1951(a) and 2.

Count Fourteen

Violation: 21 U.S.C. § 843(b)
(Use of a Communication Facility
to Facilitate Drug Felony)

That on or about February 14, 2022, in the Eastern District of Texas, [REDACTED] defendant, did knowingly and intentionally use a communication facility, the U.S. Mail, in facilitating the distribution of a Schedule II substance, an act constituting a felony under Title 21, United States Code, Section 841.

In violation of 21 U.S.C. § 843(b).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 18 U.S.C. § 982 and 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

KEL-TEC P3AT .380ACP pistol, Serial Number J0U53, seized from **Corey Bouchea Grant**.

Taurus G2 9mm pistol, Serial Number TIY64803, seized from **Matthew Curtis Anderson**.

Jimenez Arms 9mm pistol with the Serial Number Filed off, seized from **Thomas Allen Martin.**

Taurus 9mm pistol, Serial Number ABK045114, seized from **Tyler Joseph Gatten.**

American Tactical .45ACP pistol, Serial Number TB101222, seized from **Tyler Joseph Gatten.**

Ruger LCP II .22LR pistol, Serial Number 380560514, seized from **Jasmine Arnetta Pleasant.**

\$4,225 in U.S. Currency seized from **Zachery Xavier Williams.**

Fabrique National model 509 pistol, Serial Number GKS0005965, seized from **Tyler Allen Stotsky.**

Springfield Armory model Hellcat pistol, Serial Number AT263307, seized from **Tyler Allen Stotsky.**

Ruger model M77 rifle, Serial Number 712-50674, seized from **Tyler Allen Stotsky.**

Sig Sauer model 716 G2 rifle, Serial Number 22P072270, seized from **Tyler Allen Stotsky.**

Ruger model Ruger Precision Rifle, Serial Number 1801-11862, seized from **Tyler Allen Stotsky.**

Taurus G2C 9mm pistol, Serial Number TLY23792 seized from [REDACTED]

[REDACTED]
\$2,620 in U.S. Currency seized from **Prentiss Lavale Mullins.**

\$7,700 in jewelry seized from **Prentiss Lavale Mullins**.

\$2,863 in U.S. Currency seized from **Mark Anthony Jackson**.

Kahr Arms, model K40, .40SW pistol, Serial Number DF7541, seized from **Adan Mendoza**.

DPMS Inc., model A15, Multi caliber rifle, Serial Number FFH309001, seized from **Adan Mendoza**.

Sweden, Model M1896, 6.5mm rifle, Serial Number 37743, seized from **Adan Mendoza**.

M&M Industries, Unknown model, Multi caliber rifle, Serial Number MM1378, seized from **Adan Mendoza**.

Radikal Arms, Model Nk-1, 12ga shotgun, Serial Number 21BP-3133, seized from **Adan Mendoza**.

Glock, Model 19X, 9mm pistol, Serial Number ADMG170, seized from **Adan Mendoza**.

Colt, Government Model 1911, .45ACP pistol, Serial Number 2825113, seized from **Adan Mendoza**.

Savage, Model Stevens 87C, .22LR rifle, No Serial Number, seized from **Adan Mendoza**.

Japan, Type 99, 6.5mm rifle, Serial Number 81404, seized from **Adan Mendoza**.

Sarsilmaz, Model B6C, 9mm pistol, Serial Number T1102-18G00871, seized from **Adan Mendoza**.

Shadow Ops Weaponry, Model SHDW-15B, .300-caliber pistol, Serial Number
15B-5791, seized from **Adan Mendoza**.

1924 rounds of assorted ammunition seized from **Adan Mendoza**.

Camouflage ballistic vest seized from **Adan Mendoza**.

A TRUE BILL

GRAND JURY FOREPERSON

BRIT FEATHERSTON
UNITED STATES ATTORNEY

HEATHER RATTAN
Assistant United States Attorney

Date

[REDACTED] (25)	§
CHANCELLOR MARTIN RAMSEY (26)	§
a.k.a. "Chance"	§
SAVANNAH ASHLYN TURCIC (27)	§
DANIEL TOMAS REYNA (28)	§
[REDACTED] (29)	§
JOSHUA KYLE MCCLURG (30)	§
NATHAN EDWARD MILBERY (31)	§
[REDACTED] (32)	§
[REDACTED] (33)	§
[REDACTED] (34)	§
a.k.a. [REDACTED]	§
[REDACTED] (35)	§
a.k.a. [REDACTED]	§
ADAN MENDOZA (36)	§
[REDACTED] (37)	§
[REDACTED] (38)	§
a.k.a. [REDACTED]	§
[REDACTED] (39)	§
[REDACTED] (40)	§
a.k.a. [REDACTED]	§
[REDACTED] (41)	§
[REDACTED] (42)	§

NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. § 846

Penalty: If one (1) kilogram or more of a mixture containing a detectable amount of heroin; if 50 grams or more of methamphetamine (actual) or if 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine; not less than 10 years and not more than life imprisonment and if death or serious bodily injury results from the use of such substance shall be not less than 20 years or more than life, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00

Counts Two – Eight, and Twelve

Violation: 18 U.S.C. § 924(c)

Penalty: Imprisonment for not more than five years to be served consecutive with any other term; a fine not to exceed \$250,000, or both; a term of supervised release of not more than five years.

Special Assessment: \$100.00

Count Nine

Violation: 21 U.S.C. § 846

Penalty: Not more than 20 years imprisonment; a fine not to exceed \$1 million, or both; a term of supervised release of at least 3 years.

If after a prior conviction for a felony drug offense has become final, a term of imprisonment not more than 30 years, a fine not to exceed \$2 million, or both; a term of supervised release of at least 6 years.

Special Assessment: \$100.00

Count Ten

Violation: 18 U.S.C. § 1956(h)

Penalty: Not more than 20 years imprisonment; a fine not to exceed \$500,000 or twice the pecuniary gain or loss, and a term of supervised release of not more than 3 years if the conspiracy is to violate 18 U.S.C. § 1956(a)(1)(A)(i) or (a)(1)(B)(i);

Not more than 10 years imprisonment; a fine not to exceed \$250,000 or twice the pecuniary gain or loss, and a term of supervised release of not more than 3 years if the conspiracy is to violate 18 U.S.C. § 1957.

Special Assessment: \$100.00

Count Eleven

Violation: 49 U.S.C. §§ 46306(b)(6) and (c)(2)

Penalty: Not more than 5 years imprisonment; a fine not to exceed \$250,000, or both; and a term for supervised release of at least 2 years.

Special Assessment: \$100.00

Count Thirteen

Violation: 18 U.S.C. §§ 1951(a) and 2

Penalty: Imprisonment for a term of not more than 20, a fine not to exceed \$250,000.00, or twice the gross pecuniary gain to the defendant or twice the gross pecuniary loss to the victim, whichever is greater both; or both and a term of supervised release of not more than three years.

If any person commits such a violation after a prior conviction for a serious drug felony has become final, such person shall be sentenced to not less than 10 years and not more than life imprisonment, a fine not to exceed \$8 million, or both; term of supervised release of at least 8 years.

Special Assessment: \$100.00

Count Fourteen

Violation: 21 U.S.C. § 843(b)

Penalty: Not more than 4 years imprisonment; a fine not to exceed \$250,000 or both; and a term for supervised release of at least 3 years.

Special Assessment: \$100.00